

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

Scott Hutchison Enterprises, Inc., et al.,	:	Civil Action No. C-1-01-776
	:	
Plaintiffs	:	Judge Weber
	:	
v.	:	
	:	
Rhodes, Inc., et al.,	:	NOTICE OF MANUAL FILING OF
	:	DEPOSITION EXHIBITS
Defendants	:	
	:	

Defendant H.T. Boggs gives notice of the manual filing of Deposition Exhibits 1 - 201 with index of the exhibits.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that he served a copy of the foregoing electronically or by regular United States mail, postage prepaid this 7th day of April, 2004 on the following:

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/s/ Thomas R. Schuck

Scott Hutchison Enterprises, Inc., et al.

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Rhodes, Inc., et al.**Civil Action No. C-1-01-776**

Date	Bates Number	Description	Exhibit
09/08/2003		Defendant H.T. Boggs' Notice of Taking Depositions	001
09/08/2003		Subpoena for Deposition and Production of Documents Served on Mitchell L. Klein on 09/11/2003	002
02/21/2002		Subpoena for Deposition and Production of Documents Served on Mitchell L. Klein on 02/08/2002	003
	K00483 - K00486	Letter of Intent of Scott Hutchison Enterprises, Inc. to enter into lease with Boggs covering property "currently used by H.T. Boggs in his mobile home sales business on Route 52 together with strip of land along Route 52" and Notes listing Boggs' phone & fax numbers	004
	K00547	Handwritten notes re Hutchison/Boggs real estate transaction	005
	K00549	Handwritten notes re Hutchison/Boggs real estate transaction	006
	K00340	Handwritten notes re project, attorney fees, and closing date	007
	K00309	Undated note to "John" from "Mitch" requesting approval of \$1.3 million lender's policy	008
11/08/1999	K00462	Questions re H.T. Boggs property with handwritten notes	009

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Date	Bates Number	Description	Exhibit
09/17/1999	K00550 - K00555	Facsimile to S. Hutchison from Klein & Hall attaching rough draft of Sales Agreement for Boggs deal	010
	K00539 - K00544	Handwritten note to Scott attaching revised Real Estate Sales Agreement	011
09/22/1999	K00514 - K00522	Lease, Option to Purchase Real Estate and Purchase of Inventory between Scott Hutchison Enterprises, Inc. and Boggs (not executed)	012
	K00480 - K00482	Agreement between Boggs Landing, Inc. and Scott Hutchison Enterprises, Inc. (not executed)	013
10/19/1999	B00293 - B00297	Fax from M. Klein to D. Konrad delivery of \$100,000 check and requirements of S. Hutchison's lender re closing; draft real estate sales agreement attached	014
10/19/1999	B00307 - B00314	Fax from M. Klein to D. Konrad re status of lender's requirements and second draft of real estate sales agreement	015
10/19/1999	B00303 - B00306	Letter from D. Konrad to M. Klein forwarding revisions to proposed real estate sales agreement	016
10/19/1999	K00523 & K00426	Letter to M. Klein from D. Konrad with suggested revisions to proposed Real Estate Sales Agreement	017
10/20/1999	K00420 - K00425	Partial copy of Real Estate Sales Agreement with handwritten notes and revisions	018

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Date	Bates Number	Description	Exhibit
10/20/1999	B00315 - B00323	Fax from M. Klein to D. Konrad re additional changes to real estate sales agreement and procedure for delivery of \$100,000 check	019
10/20/1999	B00330 - B00336	Fax from M. Klein to D. Konrad okaying revisiosn and stating that S. Hutchison will deliver \$100,000 check at 3PM	020
10/20/1999	B00337 - B00340	Unexecuted real estate sales agreement w/portions in bold italics	021
10/20/1999	K00491 - K00497	Second Draft of Real Estate Sales Agreement with handwritten revisions	022
10/20/1999	K00005 - K00011	Real Estate Sales Agreement between Scott Hutchison Enterprises and H.T. Boggs--Final Version	023
10/20/1999	K00524	Memorandum to Brass Thompson from M. Klein enclosing copies of "everything that they have made available" (no attachments)	024 093
10/20/1999	K00427	Memorandum to "John" from "Mitch" enclosing copies of "everything that they have made available" and ordering copies of all easements, out-conveyances and 1998 tax tickets (no attachments)	025
10/20/1999	K00313 - K00314	Memorandum to "John" from "Mitch" enclosing copies of "everything that they have made available" and ordering copies of all easements, out-conveyances and 1998 tax tickets and handwritten note re description of project and listing various questions that need to be addressed	026

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Date	Bates Number	Description	Exhibit
10/20/1999	K00344	Handwritten note on Flynn, Max, Miller, Toney & Klein, L.C. (Real Estate Law Firm) re purchase of up to 17 parcels and noting that surveyor is Brass Thompson	027
05/22/2001	R00011 - R00013	Fax to B. Ketchum from J. Zimmer attaching Rhodes Inc. Proposal Acceptance by S. Hutchison	028 133
10/21/1999	K00506 - K00513	Facsimile to Hutchison from Klein forwarding first draft of Real Estate Sales Agreement for review	029
	K00498	Letter to Dan from Mitch re delivery of cashier's check, lender's insistence on specified items and lender's waiver of appraisal (no attachment)	030
10/21/1999	K00499 - K00505	First Draft of Real Estate Sales Agreement	031
10/21/1999	K00487 - K00490	Draft Real Estate Sales Agreement with handwritten revisions	032
10/22/1999	K00477 - K00479	Facsimile cover sheet to Klein from Konrad attaching Bill of Sale and Assignment between Boggs Landing, Inc. and Scott Hutchison Enterprises, Inc.	033
	K00133 - K00137	Title Search Order Form and Abstractor's Report noting "defect" re Alice Philpot's 1/2 interest in property and several other questions -- Parcel #06-135-0100	034
	K00406	Hutchison Survey Notes with handwritten note "closes Monday at 11:30"	035

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Date	Bates Number	Description	Exhibit
11/01/1999	HB0008 - HB0010	Bill of Sale and Assignment between Boggs Landing and Scott Hutchison Enterprises for eleven manufactured homes	036
11/01/1999	HB0011 - HB0013	Agreement between Boggs Landing and Scott Hutchison Enterprises confirming previous payment for two manufactured homes and confirming agreement to transfer seven new and two used manufactured homes	037
11/08/1999	K00476	First American Title Insurance stating that there is and is not a wet land problem	038
11/17/1999	K00417	First American Title Insurance Company faxed to M. Klein from L. Baldwin	039
11/09/1999	K00468	Handwritten note to Mitch from John attaching easement & defect information and cost of lenders policy (no attachment)	040
	K00150	Facsimile memorandum to K. Waldo from M. Klein re potential title defect concerning Alice Philpot's % interest in property	041
11/09/1999	HB0432-HB04 39	Draft Commitment for Lenders Title Insurance Policy in the amount of \$1,300,000 with handwritten notes by M. Klein	042
	K00175 - K00179	Miscellaneous plats/maps of property and surrounding area	043
10/27/1999	K00168 - K00174	Search performed on Boggs for tax year 1998	043

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Date	Bates Number	Description	Exhibit
11/09/1999	K00158 - K00167	Letter to Robert Wasserman at Midland Title Security, Inc. from John E. Hall enclosing the "Large Policy Authorization form" and the "commitment and legal	043
11/09/1999	K00293	Facsimile note to "John" from "M" requesting legal description re Hutchison and attaching title insurance commitment and authorization form (not attached)	044
	K00294 - K00308	Miscellaneous plats of various parcels of land	045
11/12/1999	K00456 - K00457	Letter to M. Klein from J.L. Stephens attaching two plats and legal description; suggests utilization of legal description provided for property south of State Route 7 and existing descriptions for remaining parcels (plats not attached)	046
12/03/1999	K00081 - K00087	Conveyance of property from Boggs to W.N. & Scott Hutchison with attachments	047
12/06/1999	K00345 - K00347	Settlement/Disclosure Full Balance Sheet and Check Register	048
12/06/1999	H00290 - H00291	Settlement Statement for sale of property totaling \$1,100,000 by H.T. Boggs to W.N. and Scott Hutchison Partners	049
12/06/1999	K00098 - K00106 K00373 - K00381	Mortgage between W.N. & Scott Hutchison Partners and Huntington National Bank for property located at US RT 52 & Macedonia Road, South Point, Ohio	050

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Date	Bates Number	Description	Exhibit
12/06/1999	K00107 - K00114	Assignment of Rents between W.N. & Scott Hutchison Partners and Huntington National Bank for property located at US RT 52 & Macedonia Road, South Point, Ohio	051
12/09/1999	K00151 - K00154	Lenders Title Policy from First American Title Insurance Company (not executed)	052
12/09/1999	HB0409 - HB0416	Policy of Title Insurance from First American Title Insurance Company on W.N. & Scott Hutchison Partners property in the amount of \$1,300,000	053
09/08/2003		Subpoena for Deposition and Production of Documents Served on Robert Van Nostrand on 09/11/03	054
02/21/2002		Subpoena for Deposition and Production of Documents Served on Custodian of Records for Huntington National Bank on 02/08/02	055
07/27/2003		Subpoena for Deposition and Production of Documents Served on Custodian of Records for Huntington National Bank on 06/24/03	056
12/09/1999		Lenders Title Insurance Policy of First American Title Insurance Company to the Huntington National Bank for subject property vested in W. N. & Scott Hutchison Partners.	057
09/30/2003		Letter from T. Schuck to G. Ullman of Huntington National Bank Re: Documents subpoenaed from Huntington Bank.	058

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Date	Bates Number	Description	Exhibit
10/18/1999	H00532 - H00659	Appraisal of Boggs Landing Manufactured Home Park for Robert Van Nostrand, VP of Huntington National Bank prepared by L. Dean Schwartz, Senior VP of Reed, Hartleben, Burrell, Lipscomb & Cone a Division of McDaniel, Inc. showing an "As Is Value Including Extra Land" of \$1,150,000 and an "As If Finished Value" of \$1,715,000	059
10/12/1999		Letter to S. Hutchison from R. Van Nostrand approving request for financing contingent on approval of appraisal, Phase I Environmental Site Assessment, proof of insurance, title insurance, survey and properly executed loan documents (no attachment)	060
10/25/1999	HB0722 - HB727	Officer Memo from R. Van Nostrand to Credit re Scott Hutchison Enterprises' financing of acquisition of 11 mobile homes	061
10/28/1999	R00057 - R00058	Fax cover sheets from D. Spivey to R. Van Nostrand and S. Hutchison forwarding letter re preliminary letter for Phase I Environmental Assessment for S. Hutchison	062
10/28/1999	R00059 - R00060	Letter to R. Van Nostrand from A. Spivey and J. Zimmer re preliminary letter for Phase I Environmental Assessment of Proposed Acquisition for S. Hutchison	063
10/29/1999	K00399	Invoice to R. Van Nostrand from McDaniel, Inc. for appraisal of properties located on Route 75, Near Lavalette, Wayne County, West Virginia	064

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Date	Bates Number	Description	Exhibit
10/29/1999	HB0769	Corporate Resolution of Scott Hutchison Enterprises authorizing loan from HNB in the amount of \$250,000 maturing 10/30/00 (pg. 1 only)	065
06/09/1998	HB0134	Transmittal from Susan Blees to Joanne Strickland of documentation checklist for Scott Hutchison Enterprises' \$430,000 business loan	066
10/05/1998	HB0109 - HB0110	Commercial Loan Documentation Checklist for Scott Hutchison Enterprises loan in the amount of \$214,000	066
05/21/1999	HB0081 - HB0082	Commercial Loan Documentation Checklist for Scott Hutchison Enterprises loan in the amount of \$225,000	066
05/21/1999	HB0083 - HB0084	Commercial Loan Documentation Checklist for Scott Hutchison Enterprises loan in the amount of \$1,700,000 (with handwritten notes)	066
10/20/1999	HB0107	Commercial Loan Document Checklist for Scott Hutchison Enterprises loan in the amount of \$656,500	066
12/03/1999	HB0093 - HB0094	Commercial Loan Documentation Checklist for Scott Hutchison Enterprises loan in the amount of \$1,650,000	066
06/28/2001	HB0019	Commercial Loan Documentation Checklist for \$50,000 loan using real property located at 17-19-21 Washington Avenue as collateral	066

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Date	Bates Number	Description	Exhibit
09/14/2001	HB0027	Commercial Loan Documentation Checklist for \$3,500,000 loan	066
11/01/1999	HB0042	Mortgage Loan Facility Request for Scott Hutchison Enterprises showing a total exposure of \$4,669,545	067
11/02/1999	H00775 - H00784	Officer Memorandum to Credit from Bob Van Nostrand re Scott Hutchison Enterprises acquisition & development financing Boggs Landing MHP & adjacent land	068
	HB1024 - HB1046	American Society of Testing and Materials Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process	069
11/08/1999	R00064 - R00084	Draft Report of Phase I Environmental Site Assessment	070
11/08/1999	H00007 - H00059	Phase I Environmental Site Assessment of Two Tracts: A 14.64 acre mobile home park and an undeveloped 13.37 acre tract prepared by Rhodes, Inc. for S. Hutchison	071 135
12/06/1999	HB0157 - HB0164	Construction Loan Agreement between HNB and W.N. & Scott Hutchison Partners in the amount of \$1,650,000 and maturing 12/6/09	072
12/06/1999	HB0043 - HB0045	Promissory Note between W.N. & Scott Hutchison Partners and HNB in the amount of \$1,650,000 w/interest rate of 8.5% and maturing 12/06/09	073

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Date	Bates Number	Description	Exhibit
12/09/1999	HB0363 - HB0372	Mortgage between W.N. & Scott Hutchison Partners and HNB for property located at US Route 52 & Macedonia Road, South Point, OH	074
12/09/1999	HB0373 - HB0378	Mortgage between Hutch & Sons Partnership and HNB for property located at Rome Township, Joe Montrose Estate Subdivision, Lots #58, 59 & 60, Proctorville, OH	074
12/09/1999	HB0383 - HB0390	Assignment of Rents between W.N. & Scott Hutchison Partners and HNB for rents from property located at US Route 52 & Macedonia Road, South Point, OH	075
09/28/2000	H00292 - H00293	Unsigned Settlement Statement for sale of property totaling \$1,215,000 by W.N and Scott Hutchison Partners to Scott Hutchison Enterprises, Inc.	076
09/01/2000	K00033 - K00041	Memorandum of Partnership Agreement for W.N. & Scott Hutchison Partnership, an Ohio general partnership	077 109
11/08/2001	HB0767 - HB0768	Assumption Agreement among W.N. & Scott Hutchison Partners as Seller, Scott Hutchison Enterprises as Purchaser and HNB as Lender--assuming all responsibilities for \$1,650,000 Note dated 12/06/99 and \$1,650,000 mortgage	078 110

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Date	Bates Number	Description	Exhibit
08/08/2001	H00660 - H00774	Appraisal of Brianna Rose Mobile Home Park for Robert Van Nostrand, VP of Huntington National Bank prepared by Larry M. McDaniel of Precision Appraisal Services showing an "As Is Value" of \$1,300,000	079
09/07/2001	HB0728 - HB0731	HBI Site Inspection Questionnaire: Borrower is Scott Hutchison Enterprises and Hutch & Son; Loan Officer is Bob Van Nostrand; proposed closing date is 09/14/01--handwritten note at top states "Brianna Rose (Boggs) Property"	080 103
09/14/2001	HB0501 - HB0502 HB0504 (p. 2)	Business Loan Agreement between Scott Hutchison Enterprises, Hutch & Sons and HNB in the amount of \$3,500,000 maturing 07/06/10	081
09/14/2001	HB0072 - HB0074	Promissory Note between Scott Hutchison Enterprises, Hutch & Sons and HNB in the amount of \$3,500,000 w/interest rate of 5.751% and maturing 07/06/10	082
09/14/2001	HB0578 - HB0587	Mortgage between Scott Hutchison Enterprises and HNB for 12 parcels on US Route 52, South Point, OH	083
09/14/2001	HB0588 - HB0595	Assignment of Rents between Scott Hutchison Enterprises and HNB for 12 parcels on US Route 52, South Point, OH	084
09/14/2001	HB0177 - HB0179	Commercial Guaranty: Borrower is Scott Hutchison Enterprises and Hutch & Sons; Lender is HNB; Guarantor is W.Scott Hutchison--the amount of the guaranty is unlimited	085

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Date	Bates Number	Description	Exhibit
09/14/2001	HB0180 - HB0182	Commercial Guaranty: Borrower is Scott Hutchison Enterprises and Hutch & Sons; Lender is HNB; Guarantor is Laya Hutchison--the amount of the guaranty is unlimited	086
09/18/2001	HB0523	FEMA Standard Flood Hazard Determination for Scott Hutchison Enterprises' property located at County Road 1, Brianna Rose Trailer Park, South Point, OH	087
10/31/2001	HB0508 - HB0509	Business Loan Agreement between Scott Hutchison Enterprises and HNB for \$712,500 loan maturing 11/30/06	088
09/08/2003		Subpoena for Deposition and Production of Documents served on Scott Hutchison.	089
01/25/1998		Drawing of Boggs Landing Addition	090
01/25/1998	HB0300 - HB0357	State Auto Insurance Companies Policy #PBP953623701 owned by Scott Hutchison Enterprises	091
10/20/1999	H00001 - H00004	Letter agreement between Rhodes, Inc. and S. Hutchison for Phase I Environmental Assessment of property	092
11/12/1999	K00396	Invoice to S. Hutchison from Rhodes Inc. for services rendered in connection with preparation of Phase I Environmental Assessment	094

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Date	Bates Number	Description	Exhibit
05/11/2000	H00379 - H00383	Letter from Michael D. Gheen, Chief, Regulatory Branch of the Dept. of the Army to S. Hutchison directing that he cease further dredge and fill activities on the site and requesting that he provide information to assist with evaluation of the matter	095
08/01/2000	H00374 - H00375	Invoice from Thomas Company to W.N. & Scott Hutchison Enterprises for \$4,016	096
		Vicinity Map, USGS Topo 7.5' (Rev 1985) Catlettsburg, KY, OH, WV, Perry Township, Lawrence County, Ohio	097
09/26/2000	H00373	Letter from Treva J. Knasel, Ecological Analyst for Ohio Dept. of Natural Resources to Andy Lockwood re location of Bignonia capreolata, cross-vine, a potentially threatened species, on the property	098
	H00349	Proposed Project Layout for Brianna Rose Park North prepared by Thomas Company	099
05/03/2000	H00351	Letter from Michael D. Gheen, Chief, Regulatory Branch of Department of Army to S. Hutchison requesting information re unauthorized placement of fill or dredged material on property	099
12/15/2000	H00350	Letter to Tammy R. Fudge from Andy Lockwood, Geologist/Project Manager for Thomas Company enclosing two copies of Section 404 permit application and Wetlands Impact Report for Brianna Rose Park North (no attachments)	099

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Date	Bates Number	Description	Exhibit
12/27/2000	H00348	Memo from Tammy R. Fudge re evaluation of a request for an after-the-fact Dept. of the Army permit	099
03/05/2001	H00366 - H00368	Letter to S. Hutchison from James M. Richmond, Chief, North Permit Section of the Dept. of the Army attaching copies of letters expressing concerns about proposed Brianna Rose Mobile Home Park	100
03/26/2001	H00358 - H00360	Letter from James Richmond, Chief, North Permit Section of the Dept. of the Army, to S. Hutchison attaching two letters expressing concerns about the proposed Brianna Rose Mobile Home Park due to the Eastern spadefoot toad	101
03/26/2001	H00361 - H00362	Letter from Kenneth C. Lammers, Acting Supervisor fo the U.S. Dept. of the Interior, Fish and Wildlife Service to Col. Dana Robertson opposing development of property due to the Eastern spadefoot toad	102
11/08/2001		Complaint filed in Case No. C-1-01-776 before U.S. District Court, Southern District of Ohio, Western Division	104
04/23/2002		First Amended Complaint in Case No. C-1-01-776 before U.S. District Court, Southern District of Ohio, Western Division	105
	H00785 - H00803	Scott Hutchison Enterprises, Inc. Vendor Ledgers and Invoices	106
10/06/2003		Brianna Rose Mobile Home Park Rent Roll	107

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Date	Bates Number	Description	Exhibit
09/08/2003		Subpoena for Deposition and Production of Documents Served on Laya Hutchison on 09/12/2003	107A
09/25/2000	H00304 - H00310	Deed transferring various parcels of property from W.N. & Scott Hutchison Partners to Scott Hutchison Enterprises, Inc. (recorded 10/02/00)	108
12/01/2000	H00377	Invoice from Thomas Company to W.N. & Scott Hutchison Partners for \$4,268.67	111
12/31/2000	H00378	Invoice from Thomas Company to W.N. & Scott Hutchison Partners for \$3,955.89	111
11/01/2000	H00376	Invoice from Thomas Company to W.N. & Scott Hutchison Enterprises for \$1,730	111
	H00412 - H00419	Scott Hutchison Enterprises, Inc. Income Statements for 2000	112
	H00467 H00478 H00483 H00492	Scott Hutchison Enterprises, Inc. U.S. Income Tax Return for an S Corporation for 2000	113
	H00420 - H00428	Scott Hutchison Enterprises, Inc. Income Statements for 2001	114
	H00495 H00508 H00526	Scott Hutchison Enterprises, Inc. U.S. Income Tax Return for an S Corporation for 2001	115
	H00429 - H00438	Scott Hutchison Enterprises, Inc. Income Statements for 2002	116

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Date	Bates Number	Description	Exhibit
	H00439 - H00445	Scott Hutchison Enterprises, Inc. Income Statements for January-June, 2003	117
09/08/2003		Subpoena for Deposition and Production of Documents Served on L. Dean Schwartz on 09/15/03	118
10/18/1999		Photos of Boggs Landing Mobile Home Park and vacant lot	119
09/08/2003		Subpoena for Deposition and Production of Documents Served on Larry M. McDaniel on 09/15/03	120
		Exhibit A to Subpoena to Kevin J. Waldo Re: Documents requested.	121
09/28/1999	K00526 - K00527	Letter to Hutchison from Boggs with layman's description of attached drawing of parcel of land	122
		Plat of survey for Scott Hutchison Enterprises, Inc. of McGhee's Addition prepared by Jeffrey L. Stephens.	123
02/18/2002		Plat drawing of Boggs property	124
02/14/2002	B00270	Photo--View of property line between Navy Trucking and Hutchison properties from south	125
10/20/2003		Amended Notice to Take the Deposition of Daniel J. Konrad, Esq.	126
11/05/1999	B00368 - B00369	Huddleston Bolen invoice to H.T. Boggs	127

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Date	Bates Number	Description	Exhibit
12/09/1999	B00370	Huddleston Bolen invoice to H. T. Boggs Company, Inc. c/o Mark Richardson.	128
10/16/2003		Amended Notice to Take the Deposition of Larry Rhodes.	129
		Exhibit A of Subpoena to Larry Rhodes c/o Rhodes Incorporated.	130
11/06/2001		Rhodes Incorporated services brochure.	131
10/20/1999	R00001 - R00004	Proposal to S. Hutchison from Adonis Spivey, Environmental Consultant, and James Zimmer, Project Geologist, re Phase I Environmental Assessment	132
10/28/1999		Fax from Rhodes, Inc. to B. Van Nostrand of Huntington Bank and S. Hutchison Re: Phase I Environmental Assessment.	134
		Handwritten notes re: photo essay	136
11/08/1999		Site Vicinity Map, 8130 County Road 1, South Point, OH 45680	137
11/08/1999		1981 Ohio Geologic Map, Phase I Environmental Site Assessment	138
11/08/1999		1968 Topographic Map, Revised 1985, Catlettsburg, Ky-Ohio-W. Va. Phase I Environmental Site Assessment by Rhodes Incorporated.	139
11/08/1999		Site Photographs, Phase I Environmental Site Assessment	140

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Date	Bates Number	Description	Exhibit
		EcoSearch Environmental Resources, Inc. Priority Risk Report Map	141
		EcoSearch Environmental Resources, Inc. Priority Risk Report Map	142
00/00/1985		EcoSearch Environmental Resources, Inc. USGS 7.5 Minute Topographical Map	143
05/09/2001	R00008 - R00010	Fax letter to A. Spivey, J. Zimmer and H. Jack Geisler, P.E., Vice President, Engineering Services requesting explanation as to why wetlands were not identified in Phase I ESA	144
05/16/2001	H00005 - H00006	Letter to Bert Ketchum from J. Zimmer and H. Jack Geisler explaining why the Phase I Environmental Assessment failed to identify wetlands in undeveloped 13.37 acre tract	145
05/22/2001	R00014 - R00015	Fax to J. Zimmer and H.J. Geisler from B. Ketchum requesting copies of information provided by S. Hutchison including any and all agreements or contracts. (Exhibit does not have Bates numbers)	146
	R00016 - R00017	Driving directions from Lexington, KY to South Point, OH	147
11/04/1999		Earthquakes in Ohio from the Ohio Geological Survey Home Page.	148
06/26/0200		Reply of Larry Rhodes, Inc., dba Rhodes, Inc. to Plaintiffs' Response to Motion to Stay.	149

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Date	Bates Number	Description	Exhibit
11/02/2001		Reliance Insurance Company (In Liquidation) letter to Rhodes Incorporated Re: Commonwealth Court of Pennsylvania entered an Order of Liquidation to Reliance Insurance Company and affiliates.	150
07/24/2003		Letter from L. Smolucha of Office of the Director of Insurance for the State of Illinois to S. Casolari of Marshall, Dennehey, Warner, Colman & Goggin Re: Legion Indemnity Company in Liquidation.	151
11/19/1999		Check from Rhodes, Inc. to EcoSearch Environmental Resources, Inc. for \$125.00 for Priority Risk Report: 8130 Country Road, South Point, OH	152
04/00/1983		National Wetland Inventory aeruak photography of Catlettsburg, Ky - Ohio - W.Va.	153
10/26/1999		Kodak film processing envelope for Doni Cooke.	154
		USGS Topographic Map Symbols	155
		Amended Notice to Take the Deposition of Thaddeus Blatt via Steno and Video.	156
		Exhibit A of Subpoena to Thaddeus Blatt, L. J. Navy Trucking.	157
04/29/1995	H00409	Photo of site provided by the U.S. Geological Survey	158

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Date	Bates Number	Description	Exhibit
05/03/1995	H00385 - H00400	Letter to Samuel A. Wood, P.E., Operations Manager for Scott R. Smith Environmental Management Consultants, Inc. from Dan K. Evans, Ph.D. enclosing the report on the L.J. Navy wetlands	159
		Business card for Dewey Jalanivich, Sales Manager of Boggs Landing Mobile Homes	160 193
02/07/1996		Transfer of property from Thaddeus and Glenda Blatt to Yellow Freight System, Inc.	161
		Amended Notice to Take the Depositin of Tammy Fudge, U.S. Army Corps of Engineers, EPA Division.	162
		Exhibit A of Subpoena to Tammy Fudge.	163
01/11/2002	B00001	Letter to K. Waldo from James M. Richmond, Chief, Regulatory Branch of Department of Army enclosing copy of Brianna Rose Park North file (not attached)	164
04/19/2000	H00355 - H00356; H00384 (Ltr Only)	Letter to Tammy R. Fudge from Andy Lockwood attaching property map	165 166
04/25/2000	H00352 - H00353	Memo from Tammy R. Fudge re site visit at Hutchison property with Lee Marcum and Andy Lockwood	167
12/11/2000	H00060 - H00261	Wetlands Impact Report prepared by Thomas Company for S. Hutchison	168 175

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Date	Bates Number	Description	Exhibit
03/16/2001	H00357	E-mail from Don Povolny to Tammy Fudge re: The Ohio Department of Natural Resources has completed their review and strongly oppose the project because of the danger to the wetlands	169
03/20/2001	H00363 - H00364	Letter from Amy L. Holthouse, Section 401 Coordinator, Division of Surface Water, Ohio EPA to Andy Lockwood outlining options available to S. Hutchison with regard to property	169
		Notice of Deposition of Jeffrey L. Stephens	170
		Jeffrey L. Stephens Witness File	171
		Subpoena issued to Jeffrey L. Stephens	171
		Jeffrey L. Stephens documents produced at deposition.	172
07/02/2000	H00804 - H00813	Report of Preliminary Survey prepared by Jeffrey L. Stephens (with attachments)	173 174
11/02/1999		Letter from Thomas Company to Scott Hutchison re: base map requirements	176
11/19/2003		Notice to Take the Deposition of H.T. Boggs via Steno and Video	177
	B00268	Drawing showing Boggs Family Home, land and lots sold to Hutchison and land and lots retained by Boggs	178
		Aerial photograph of land location	179
04/29/1995		USGS Aerial Photograph	180

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Date	Bates Number	Description	Exhibit
01/29/1998		Addition to Boggs Landing	181
00/00/1999		Southern Excavating bid for cleaning, cutting, placing compacting limestone to grade and installing concrete road	182
07/08/1999		Letter from Russell Blankenship to H.T. Boggs re: cover for estimate of Southern Excavating	183
		Southern Excavating proposal and scope of work.	184
00/00/1999		Southern Excavating page 2 of proposal	185
04/12/1978		Handdrawn map.	186
		Handwritten notes of cost estimates	187
00/00/1999		Southern Excavating proposal.	188
12/08/1997		Fax transmission to H.T. Boggs from Mike re: here are the numbers you asked for	189
07/01/1998	B00377	Assignment of 1,100 shares of Boggs Landing, Inc. to Dewey Jalanivich	190
07/01/1998	B00379 - B00380	Boggs Landing, Inc. Minutes of Shareholders' Action Without a Meeting re: resolved that H.T. Boggs and Dewey Jalanivich are hereby appointed directors of Boggs Landing, Inc. and officers are President/Treasurer: Dewey Jalanivich and Secretary: Ethan Boggs	191
01/01/1999	B00378	Assignment of Shares--900 shares of Boggs Landing, Inc. to Dewey Jalanivich	192

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Date	Bates Number	Description	Exhibit
10/00/1999	B00384	VISA account statement; credit card transaction list	194
10/20/1999	H01120 - 1123	Real Estate Sales Agreement between Scott Hutchison Enterprises, Inc. and H.T. Boggs	195
05/27/1960	B00372 - B375	Journal Entry on Verdict In the Matter of the Appropriation by the State of Ohio of Easements for Highway Purposes Over the Property of A.G. Davis, et al., on State Route No. 52, Section 19.5B, Lawrence County, Ohio	196
12/30/1960	K00278 - K00280	Warranty Deed of Flowance Easement Tract No. T-2056E Greenup Locks and Dam Project between H.T. & Jeanne Boggs and the USA	197
	H00410	Aerial photo of site with handwritten notes	198
	B00267	U.S. Army Corps of Engineers Chart No. 86 (1911-1914)	199
00/00/1980	B00382	USGS Aerial Map; Topographic map of Boggs Landing area	200
01/26/1998	B00371	FedEx Airbill from H.T. Boggs to Mike Porter	201